

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ANDREW CHARLES HOY	:	
Debtor	:	CASE NO. 1:16-bk-00149
	:	

MOTION FOR AMENDED ORDER TO PAY TRUSTEE

Comes now, Andrew Charles Hoy, by and through Dorothy L. Mott Law Office, LLC and requests an Order to pay Trustee, respectfully representing in support thereof:

1. The Debtor filed a Chapter 13 petition at the above-captioned docket number.
2. The Debtor receives regular income from employment which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will be much greater if the income is attached to fund the Plan.
4. The Debtor consents to the wage attachment.
5. The claims filed in the Debtor's case require a higher monthly plan payment.

Wherefore, the Debtor respectfully requests that this Court enter an Amended Order to pay Trustee in the form attached.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L Mott, Esquire
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/s/Andrew Charles Hoy

ANDREW CHARLES HOY

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
ANDREW CHARLES HOY :
Debtor : **CASE NO. 1:16-bk-00149**

AMENDED ORDER TO PAY TRUSTEE

Upon consideration of the Motion for Wage Attachment, it is hereby ORDERED that until further Order of this Court the entity from whom the Debtor, Andrew Charles Hoy, receives income:

SYGMA NETWORK INC
ATTN: PAYROLL DEPARTMENT
4000 INDUSTRIAL ROAD
HARRISBURG, PA 17110

deduct from said income the sum of \$329.00 from each two-week pay check, or \$164.50 from each weekly paycheck, as appropriate, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination or other benefits arising out of present or past employment, or from any other benefits payable to the Debtor and to remit the deductible sums to:

CHARLES J DEHART III ESQUIRE
PO BOX 7005
LANCASTER, PA 17604

and to change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

IT IS FURTHER ORDERED that the employer shall change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

IT IS FURTHER ORDERED that the entity from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore.

IT IS FURTHER ORDERED that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure.

IT IS FURTHER ORDERED that this Order shall terminate without further order upon certification that the obligation of the Debtor has been fulfilled, if it is not terminated by earlier order of this Court.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Andrew Charles Hoy
Debtor

Chapter:13

Case number:1:16-bk-00149

Andrew Charles Hoy
Movant
vs,

Matter: Motion to Pay Trustee/Wage Attachment

SYGMA NETWORK INC
Respondent

Notice

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of the notice. If you object to the relief requested, you must file your objection/response with the Clerk, U. S. Bankruptcy Court, 228 Walnut Street, Third Floor, PO Box 908, Harrisburg PA 17108-0908 and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: October 20, 2017

Dorothy L. Mott, Esquire
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
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Debtor : **CASE NO. 1:16-bk-00149**
:
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 20, 2017, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III dehartstaff@pamd13trustee.com	Electronically
ANNE K FIORENZA ASSISTANT US TRUSTEE anne.fiorenza@usdoj.gov	Electronically
SYGMA NETWORK INC ATTN: PAYROLL DEPARTMENT 4000 INDUSTRIAL ROAD HARRISBURG, PA 17110	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

/s/ Dorothy L. Mott

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